

**Wilco Finishing Corp.**  
**Draft Upland Site Summary**

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**WILCO FINISHING CORP. (DAR SITE ID #149)**

Address: 1288 Willoughby Avenue, Brooklyn, New York 11237  
(also listed at 375 Suydam Street)

Tax Lot Parcel(s): Brooklyn Block 3210, Lot 23

Latitude: 40.704821

Longitude: -73.92166

Regulatory Programs/  
Numbers/Codes: USEPA ID No. NYD987031648, NPDES ID No. NYP081080,  
AFS No. 3604703030, PBS No. 2-090581

Analytical Data Status: ☐ Electronic Data Available ☒ Hardcopies only  
☐ No Data Available

**1 SUMMARY OF CONSTITUENTS OF POTENTIAL CONCERN (COPCs) TRANSPORT  
PATHWAYS TO THE CREEK**

The current understanding of the transport mechanism of contaminants from the upland portions of the Wilco Finishing Corp. site (site) to Newtown Creek is summarized in this section and Table 1 and supported in the following sections.

**Overland Transport**

The site is located approximately 0.51 mile from English Kills. This is not a complete historical or current pathway.

**Bank Erosion**

The site is not adjacent to Newtown Creek or associated waterways. This is not a complete historical or current pathway.

**Groundwater**

The site is located approximately 0.51 mile from Newtown Creek and associated waterways. Information regarding on-site groundwater investigations was not identified in documents available for review. There is insufficient evidence to make a historical or current pathway determination.

### **Overwater Activities**

The site is not adjacent to Newtown Creek and associated waterways and has no overwater activities. This pathway is not historically or currently complete.

### **Stormwater/Wastewater Systems**

This site is within the Newtown Creek Water Pollution Control Plant (WPCP) sewershed. Wastewater generated at the site is treated (as described in Section 7.1) prior to discharge into a combined municipal sewer system. When the combined flows exceed the system's capacity, untreated combined sewer overflows (CSOs) are discharged through Outfall NC-015 to English Kills, a tributary to Newtown Creek (NYCDEP 2007). In 1992, the New York City Department of Environmental Protection (NYCDEP) issued an industrial wastewater discharge (IWD) permit authorizing the discharge of industrial wastewater from the site to the municipal sewer (NYCDEP 1992b). The permit was renewed in 1993, 1998, 2002, and 2003 and is discussed in Section 9.3 (NYCDEP 1993, 1998, 2002b, 2003a).

Additional permits were not identified in documents available for review. Metal concentrations and pH exceeded permitted discharge limits several times between 1995 and 2004 (NYCDEP 1995, 1996a, 2002a, 2003b, 2004b). To the extent discharges were coincident with CSO events, this pathway is a complete historical pathway. There is insufficient evidence to make a current pathway determination.

Information regarding on-site stormwater management and infrastructure was not identified in documents available for review. Direct discharge of stormwater and wastewater is not a complete historical or current pathway.

### **Air Releases**

The Air Facility System (AFS) database indicates that an air discharge permit (AFS No. 3604703030) has been issued to the site; however, copies of the permit were not located in documents available for review (USEPA 2011). There is insufficient evidence to make a historical or current pathway determination.

## 2 PROJECT STATUS

Information regarding on-site environmental investigations was not identified in documents available for review. A New York State Department of Environmental Conservation (NYSDEC) Site Code was not found for this site.

## 3 SITE OWNERSHIP HISTORY

Respondent Member:

☐ Yes ☒ No

| Owner                                    | Years           | Occupant  | Type of Operation                  |
|--|-----------------|---|------------------------------------|
| Unknown                                  | 1907            | Vacant  | Vacant                             |
|  | ca. 1933        | Unknown   | 60-car-capacity garage             |
| Izi Bazinover                            | Unknown – 1976  |   | Unknown                            |
| G.M. Realty                              | 1976 – 1977     |   |                                    |
| State Realty Company                     | 1977 – 1985     |   | Metal finishing/<br>Electroplating |
|  | ca. 1985 – 1992 | Lafayette Display Fixtures, Inc., aka Lafayette Polishing and Plating |                                    |
|  | 1992 – present  | Wilco Finishing Corporation   | Electroplating                     |
| Dronacharje Balgobin/Guyana Plating, LLC | 2010 – present  | Guyana Plating, LLC   |                                    |

Note:

ca. – circa

Additional discussion and sources provided in Section 6

## 4 PROPERTY DESCRIPTION

The site occupies approximately 0.24 acre<sup>1</sup> within the Williamsburg neighborhood of Brooklyn, New York, and is located approximately 0.51 mile from English Kills, a tributary to Newtown Creek. The site is approximately 40 feet above mean sea level, and site topography slopes gently down to the northwest toward English Kills. The east side of the

<sup>1</sup> Acreage is an approximation of the site tax parcel using geographic information system data.

site is covered by a building and a parking lot occupies a portion of the west side of the site, as shown on Figure 1.

The site is zoned for manufacturing, and a residential zone is located to the east and south of the site (NYCDCP 2011). Remedial sites Tru-Tone Metal Products (DAR Site ID #146) and Technical Metal Finishers (DAR Site ID #43) are located west of the site, as shown in Figure 1.

## **5 CURRENT SITE USE**

The site is currently occupied by Wilco Finishing Corp. and Guyana Plating, LLC (NYSDOS 2011). Wilco Finishing Corp., site occupant since 1992, registered in New York State as a domestic business corporation in January 1992 (NYSDOS 2011). Operations include nickel, chromium and copper plating, nickel and chromium stripping, acid and alkaline cleaning, acid pickling, electro cleaning, and polishing. Guyana Plating, LLC, site occupant since 2010, registered in New York State as a domestic limited liability company in June 2010 (NYSDOS 2011). Guyana Plating, LLC, also specializes in electroplating.

## **6 SITE USE HISTORY**

In 1907, the site appeared to be vacant (Sanborn 1907). In 1933, a 60-car-capacity garage occupied the site (Sanborn 1933). By 1977, State Realty Company owned the site. State Realty Company later co-owned Wilco Finishing Corp. (EDR 2010).

Lafayette Display Fixtures, Inc., also known as Lafayette Polishing and Plating, was incorporated on January 4, 1971 (NYSDOS 2011). Available documents indicate Lafayette Display Fixtures, Inc., conducted metal finishing operations at 375 Suydam Street as early as 1985 (NYCDEP 1985). Lafayette Display Fixtures, Inc., dissolved operations on December 23, 1992 (NYSDOS 2011).

## **7 CURRENT AND HISTORICAL AREAS OF CONCERN AND COPCS**

The current understanding of the historical and current potential upland areas of concern at the site is summarized in Table 1. The following sections provide brief discussion of the potential sources and COPCs at the site requiring additional discussion.

Potential areas of concern at the site include areas in which electroplating and metal finishing practices and operations (including nickel, chromium and copper plating, nickel and chromium stripping, acid and alkaline cleaning, acid pickling, electro cleaning, polishing, and site discharges) occurred and an underground storage tank (UST). The COPCs associated with these areas of concern include volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals (primarily nickel, chromium, and copper), and petroleum hydrocarbons (including No. 2 fuel oil).

### **7.1 Uplands**

The site operations included nickel, chromium and copper plating, nickel and chromium stripping, acid and alkaline cleaning, acid pickling, electro cleaning, and polishing. Wastewater from the nickel and chromium plating rinses was evaporated, and the remaining solution was used to replenish the plating bath. Wastewater from the nickel and chromium stripping and copper plating was evaporated, and the sludge was manifested and shipped off site. Other wastewater entered a pit and was pH-adjusted before being discharged to the sewer (NYCDEP 2004c, 2004i). The pretreatment system involved an automatic pH monitoring system that maintained the pH of wastewater at the end of process (EOP; permitted discharge point E1) between 8 and 9 by neutralizing the wastewater with sulfuric acid and/or sodium hydroxide. Dead rinses and evaporators were utilized in the nickel and chromium lines, creating a closed loop system (NYCDEP 2004g, 2004i). In 2005, the company discontinued the nickel activator, alkaline copper and cleaner operations, and removed related tanks (NYCDEP 2005a).

Between 1985 and 2005, the site received several NYCDEP Bureau of Wastewater Treatment notices of violations (NOVs) and Commissioner's Orders for wastewater discharge exceedences and non-compliance, as discussed in Section 9.3 of this site summary.

Between 1993 and 2008 the site was intermittently classified as a Resource Conservation and Recovery Act (RCRA) hazardous waste small quantity generator (SQG), conditionally exempt SQG, and large quantity generator (LQG; EDR 2010). Waste manifests indicate that the site shipped non-listed corrosive wastes (D002) between 1994 and 2006 and additional unspecified wastes in 2008 and 2009. A 2008 hazardous waste summary also indicates that the site generated non-listed corrosive (D002) and chromium-containing (D007) wastes in 2008 (EDR 2010). In 2011, the site was classified as an active LQG (USEPA 2011). Between 1996 and 2007 the site received 21 NOVs, some of which were hazardous waste-related (EDR 2010).

The site is a registered petroleum bulk storage (PBS) facility (PBS No. 2-090581; NYSDEC 2012). A 4,000-gallon steel/carbon steel UST was installed at the site in December 1955 (EDR 2010). The UST was used to store No. 2 fuel oil and was equipped with an overfill product level gauge; however, it was lacking secondary containment, tank leak detection, internal and external tank protection, and external pipe protection (NYSDEC 2012; EDR 2010). The tank was closed in place in November 1998 (NYSDEC 2012).

## **7.2 Overwater Activities**

This site is not adjacent to Newtown Creek or associated waterways. Information regarding overwater activities was not identified in documents available for review.

## **7.3 Spills**

Information regarding on-site spills was not identified in documents available for review.

# **8 PHYSICAL SITE SETTING**

Site-specific hydrogeologic information was not identified in documents available for review. The geologic setting for Newtown Creek consists of impermeable Precambrian and Paleozoic crystalline bedrock, overlain by the Upper Cretaceous Raritan formation, Magothy formation and Matawan Group (undifferentiated), unconsolidated Pleistocene deposits and upper Pleistocene glacial deposits and Holocene shore, beach salt-marsh deposits, and alluvium, along with local occurrences of artificial fill (Buxton et al. 1981; Soren and

Simmons 1987). The primary areas of groundwater discharge are Newtown Creek and its tributaries and the East River (Misut and Monti 1999). In the vicinity of Newtown Creek, groundwater flow in the Upper Glacial aquifer is generally north and south towards the creek. With increased distance from the creek, groundwater will flow towards the nearest surface water body to discharge (Misut and Monti 1999). Incidences of perched groundwater may occur above the Upper Glacial Aquifer in some areas, particularly in formerly low-lying areas that have been filled. Groundwater flow at a specific property may differ from the regional pattern due to pumping for groundwater treatment or dewatering activities (Misut and Monti 1999), the presence of buried utilities, or other preferential pathways.

## 9 NATURE AND EXTENT (CURRENT UNDERSTANDING OF ENVIRONMENTAL CONDITIONS)

### 9.1 Soil

Soil Investigations

☐ Yes ☒ No

Bank Samples

☐ Yes ☐ No ☒ Not Applicable

Soil-Vapor Investigations

☐ Yes ☒ No

Information regarding on-site soil investigations was not identified in documents available for review.

### 9.2 Groundwater

Groundwater Investigations

☐ Yes ☒ No

NAPL Presence (Historical and Current)

☐ Yes ☒ No

Dissolved COPC Plumes

☐ Yes ☒ No

Visual Seep Sample Data

☐ Yes ☐ No ☒ Not Applicable

Information regarding on-site groundwater investigations was not identified in documents available for review.

### 9.3 Surface Water

Surface Water Investigation

☐ Yes ☒ No

SPDES Permit (Current or Past)

☐ Yes ☒ No

IDW Permit (Current or Past)

☒ Yes ☐ No

Stormwater Data

☐ Yes ☒ No

Catch Basin Solids Data

☐ Yes ☒ No

Wastewater Data

☒ Yes ☐ No

#### 9.3.1 Stormwater and Wastewater Systems

Information about on-site stormwater management and infrastructure was not identified in documents available for review. The site is within the Newtown Creek WPCP sewershed. Wastewater at the site is treated (as described in Section 7.1) prior to discharge from the site into a combined municipal sewer system. When the combined flows exceed the system's capacity, untreated CSOs are discharged through Outfall NC-015 to English Kills, a tributary to Newtown Creek (NYCDEP 2007).

#### 9.3.2 Industrial Wastewater Discharge Permits

Five IWD permits have been issued to the site by NYCDEP, as shown in the following table:

| Permit Number               | Start Date | Expiration Date |
|-----------------------------|------------|-----------------|
| 92-P 48-1<br>(NYCDEP 1992b) | 10/1/92    | 9/30/97         |
| 93-P48-1A1<br>(NYCDEP 1993) | 8/15/93    | 8/14/98         |
| 98-P48-1<br>(NYCDEP 1998)   | 8/15/98    | 8/14/03         |
| 02-P48-2<br>(NYCDEP 2002b)  | 4/4/02     | 8/11/03         |
| 03-P48-1<br>(NYCDEP 2003a)  | 8/8/03     | 8/7/08          |

Note:

NYCDEP – New York City Department of Environmental Protection



IWD permits authorize discharge of industrial wastewater to the New York City sewerage system. IWD permits for the site have historically authorized discharge from two discharge points at the site. These permitted discharge points changed from 1993 to 1998 (NYCDEP 1993, 1998). Discharge limitations, monitoring requirements, and other conditions for each discharge point are outlined in each permit.

IWD permits for the site have expired, and no current IWD permits were located in files available for review. The most recent IWD permit is summarized in the following table:

| Permit Type  | Permit Number        | Effective Date  | Outfalls <sup>1</sup>  | Volume  | Frequency-Parameters   |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
|--|----------------------|---|--|---------|--|--|--|--|-----------|----------------------|---|---------|-----|-----|------|-----|-----|--------------------|-----|-----|---|------|----|
| Industrial Wastewater Discharge Permit                       | 03-P48-1             | 8/8/03  | <b>Discharge Point E1:</b> A 4-inch-diameter effluent pipe, located in a 14-inch by 13-inch pit, 26 inches above pit floor level (Tool Room), situated 53 inches from the interior wall facing Willoughby Avenue, and 44 inches from the interior wall facing Wyckoff Avenue | Unknown | <p>Based on a facility's electroplating process wastewater flow of fewer than 10,000 gallons per calendar day, the process wastewater discharge from point E1 is covered by the Federal Electroplating Point Source Category, 40 CFR part 413, and shall not exceed the following standards:</p> <table><tr><th colspan="3">Federal Categorical Standards<br/>(40 CFR § 413.14 (b) &amp; (f))</th></tr><tr><th>Pollutant</th><th>Daily Maximum (mg/L)</th><th>Average of Daily Values for Four Consecutive Monitoring Days (mg/L)</th></tr><tr><td>Cadmium</td><td>1.2</td><td>0.7</td></tr><tr><td>Lead</td><td>0.6</td><td>0.4</td></tr><tr><td>Cyanide (Amenable)</td><td>5.0</td><td>2.7</td></tr><tr><td>Total Toxic Organics (TTO)<sup>2</sup></td><td>4.57</td><td>--</td></tr></table> | Federal Categorical Standards<br>(40 CFR § 413.14 (b) & (f)) |  |  | Pollutant | Daily Maximum (mg/L) | Average of Daily Values for Four Consecutive Monitoring Days (mg/L) | Cadmium | 1.2 | 0.7 | Lead | 0.6 | 0.4 | Cyanide (Amenable) | 5.0 | 2.7 | Total Toxic Organics (TTO) <sup>2</sup> | 4.57 | -- |
| Federal Categorical Standards<br>(40 CFR § 413.14 (b) & (f)) |                      |   |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
| Pollutant  | Daily Maximum (mg/L) | Average of Daily Values for Four Consecutive Monitoring Days (mg/L) |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
| Cadmium  | 1.2                  | 0.7   |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
| Lead   | 0.6                  | 0.4   |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
| Cyanide (Amenable)   | 5.0                  | 2.7   |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |
| Total Toxic Organics (TTO) <sup>2</sup>                      | 4.57                 | --  |  |         |  |  |  |  |           |                      |   |         |     |     |      |     |     |                    |     |     |   |      |    |

| Permit Type                              | Permit Number   | Effective Date                             | Outfalls <sup>1</sup>   | Volume  | Frequency-Parameters   |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
|--|---|--|---|---------|--|--|--|--|-----------|---|--|----|----------------------------|----|---------|-----|------|-----------------------|-----|----|--------|-----|----|------|-----|----|---------|------|----|--------|-----|----|------|-----|----|------------------------------------|-----|----|--------------------|------|----|
|  |   |  | <b>Discharge Point M1:</b> A 6-inch-diameter housetrap, located in a 30-inch by 47-inch by 64-inch pit, 64 inches above pit floor level, situated 18 inches from the interior wall facing Irving Avenue, and 18 inches from the exterior wall facing Suydam Street. | Unknown | <div>The discharges from points E1 and M1 shall not exceed the following New York City Sewer Use Limits:</div> <table><tr><th colspan="3">Sewer Use Limits<br/>(15 RCNY chapter 19)</th></tr><tr><th>Pollutant</th><th>Permissible Maximum Concentration For Any Given Time (mg/L)</th><th>Daily Average Maximum Concentration (mg/L)</th></tr><tr><td>pH</td><td>5.0-11.0<br/>Standard Units</td><td>--</td></tr><tr><td>Cadmium</td><td>2.0</td><td>0.69</td></tr><tr><td>Chromium (Hexavalent)</td><td>5.0</td><td>--</td></tr><tr><td>Copper</td><td>5.0</td><td>--</td></tr><tr><td>Lead</td><td>2.0</td><td>--</td></tr><tr><td>Mercury</td><td>0.05</td><td>--</td></tr><tr><td>Nickel</td><td>3.0</td><td>--</td></tr><tr><td>Zinc</td><td>5.0</td><td>--</td></tr><tr><td>Cyanide (Amenable to Chlorination)</td><td>0.2</td><td>--</td></tr><tr><td>Non-Polar Material</td><td>50.0</td><td>--</td></tr></table> | Sewer Use Limits<br>(15 RCNY chapter 19) |  |  | Pollutant | Permissible Maximum Concentration For Any Given Time (mg/L) | Daily Average Maximum Concentration (mg/L) | pH | 5.0-11.0<br>Standard Units | -- | Cadmium | 2.0 | 0.69 | Chromium (Hexavalent) | 5.0 | -- | Copper | 5.0 | -- | Lead | 2.0 | -- | Mercury | 0.05 | -- | Nickel | 3.0 | -- | Zinc | 5.0 | -- | Cyanide (Amenable to Chlorination) | 0.2 | -- | Non-Polar Material | 50.0 | -- |
| Sewer Use Limits<br>(15 RCNY chapter 19) |   |  |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Pollutant                                | Permissible Maximum Concentration For Any Given Time (mg/L) | Daily Average Maximum Concentration (mg/L) |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| pH                                       | 5.0-11.0<br>Standard Units                                  | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Cadmium                                  | 2.0   | 0.69                                       |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Chromium (Hexavalent)                    | 5.0   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Copper                                   | 5.0   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Lead                                     | 2.0   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Mercury                                  | 0.05  | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Nickel                                   | 3.0   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Zinc                                     | 5.0   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Cyanide (Amenable to Chlorination)       | 0.2   | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |
| Non-Polar Material                       | 50.0  | --   |   |         |  |  |  |  |           |   |  |    |                            |    |         |     |      |                       |     |    |        |     |    |      |     |    |         |      |    |        |     |    |      |     |    |                                    |     |    |                    |      |    |

Notes:

1 – This site is within the sewershed of CSO Outfall NC-015, which is located at the southeast end of English Kills.

2 – Defined in 40 CFR § 413.02(i) as the sum of all quantifiable values greater than 0.01 milligrams per liter of the 111 toxic organic compounds listed in the IWD permit. Toxic organic compounds are comprised of two subcategories: volatile organic compounds and semi-volatile organic compounds. There are different sampling methods for each subcategory (see Part I, Sect. B. Monitoring Requirements).

CFR – Code of Federal Regulations

CSO – combined sewer overflow

mg/L – milligram per liter

RCNY – Rules of the City of New York

TTO – total toxic organic

DRAFT

Between 1985 and 1990 NYCDEP Bureau of Wastewater Treatment issued seven NOV's and non-compliance to Lafayette Display Fixtures, Inc. (NYCDEP 1985, 1988a, 1988b, 1989a, 1989b, 1989d, 1990). The site was included on New York City's Significant Noncompliance List<sup>2</sup> between July 1, 1987, to June 30, 1988 (NYCDEP 1988b).

Fifteen Commissioner's Orders were issued to Wilco Finishing Corp. between 1992 and 2005 (NYCDEP 1992a, 1996b, 1996c, 2002a, 2002d, 2002e, 2003d, 2004d, 2004e, 2004f, 2004j, 2004k, 2004m, 2005b, 2005c). Several orders were issued in response to pH and nickel exceedances and required corrective actions by the site. Exceedances are described in the following table:

| Date     | Order No.               | Details  |
|----------|-------------------------|--|
| 06/08/92 | 4276<br>(NYCDEP 1992a)  | Order issued due to failure to take accidental spill precautions; spill prevention equipment must be installed.  |
| 05/01/96 | 9035<br>(NYCDEP 1996b)  | Establishment must submit sampling results of the wastewater discharged into the public sewer pursuant to the notification of non-compliance for nickel exceedances. |
| 06/17/96 | 9345<br>(NYCDEP 1996c)  | Establishment must submit sampling results of the wastewater discharged into the public sewer pursuant to the notification of non-compliance for nickel exceedances. |
| 01/22/02 | 18322<br>(NYCDEP 2002a) | Must submit engineering plans (by licensed NYSPE or RA); current diagram incorrect (tanks missing).  |
| 05/23/02 | 19437<br>(NYCDEP 2002d) | Establishment must submit sampling results of the wastewater discharged into the public sewer pursuant to the notification of non-compliance for pH exceedances.     |
| 05/23/02 | 19438<br>(NYCDEP 2002e) | Establishment must submit pH strip charts for the past 3 months from the EOP due to non-compliance for pH exceedances.   |
| 10/27/03 | 23004<br>(NYCDEP 2003d) | Order issued due to nickel exceedances in wastewater discharged (NYCDEP 2003c).  |
| 02/24/04 | 23968<br>(NYCDEP 2004d) | Establishment must submit sampling results of the wastewater discharged into the public sewer pursuant to the notification of non-compliance for pH exceedances.     |
| 04/01/04 | 23976<br>(NYCDEP 2004e) | Order issued due to nickel and pH exceedances at discharge point MHT.  |
| 04/01/04 | 23977<br>(NYCDEP 2004f) | Must maintain a pH calibration log book.   |

<sup>2</sup> Significant noncompliance is defined in 40 CFR 403.8(f)(2)(vii) of the Code of Federal Regulations and Title 15, Section 19-10 (g) of the Rules of the City of New York (NYCDEP 1988b).

| Date     | Order No.               | Details  |
|----------|-------------------------|--|
| 08/02/04 | 24582<br>(NYCDEP 2004j) | Order to evaluate pretreatment system and submit report.   |
| 08/02/04 | 24597<br>(NYCDEP 2004k) | Establishment is prohibited from running rinse water when metal finishing operations are in progress.  |
| 11/15/04 | 26426<br>(NYCDEP 2004m) | Order issued due to nickel and pH exceedances at discharge point MHT (NYCDEP 2004l). Order also included request to explain how trace element enters the acid and alkaline cleaning rinses, as indicated in a pretreatment evaluation report dated August 9, 2004. |
| 03/08/05 | 27741<br>(NYCDEP 2005b) | Must submit explanation for cause of higher metal concentrations in MHT than EOP.  |
| 07/11/05 | 28783<br>(NYCDEP 2005c) | Establishment must submit a process layout diagram, including equipment layout, tank capacities and contents, pretreatment units, location of drains, and flow diagram for such drains.  |

## Notes:

EOP – end of process

MHT – main housetrap

NYCDEP – New York City Department of Environmental Protection

NYSPE – New York State Professional Engineer

RA – registered architect

Other violations on file issued to Wilco Finishing Corp. include the following:

- A Dilution Notice (NYCDEP date unknown[a]) for attempted illegal diluting of a discharge and a Pretreatment Standards for Existing Sources document (NYCDEP date unknown[b]).
- An Explanation for Issuance (NYCDEP 1997) describing Commissioner's Order No. 93115 issued for nickel exceedances. Commissioner's Order No. 93115 was not found in available documents.
- A 2003 decision and order for an unknown violation (illegible due to poor copy quality; NYCDEP 2004h)
- A 2004 citation for pH exceedances of fewer than 5 (limit:  $5 < \text{pH} < 11$ ; NYCDEP 2004a)

### 9.3.3 NPDES/SPDES Permit

The U.S. Environmental Protection Agency (USEPA) Enforcement and Compliance History Online (ECHO) database search indicates the site has been assigned a National Pollutant Discharge Elimination System (NPDES) identification number (ID; NPDES ID No.

NYP081080; USEPA 2011). However, no historical or current NPDES permit or State Pollutant Discharge Elimination System (SPDES) permit has been located in available documents.

### 9.3.4 Wastewater Data

Wastewater data identified in files available for review is summarized as follows:

| Report Date                | Constituent   | Result     | Unit | Limit         | Notes  |
|----------------------------|---------------|------------|------|---------------|--|
| 11/27/89<br>(NYCDEP 1989c) | Chromium (Cr) | 3.6        | mg/L | Not specified | Report largely illegible due to poor copy quality.   |
|                            | Cadmium (Cd)  | x          | mg/L | Not specified |  |
|                            | Copper (Cu)   | x          | mg/L | Not specified |  |
|                            | Nickel (Ni)   | x          | mg/L | Not specified |  |
|                            | Lead (Pb)     | x          | mg/L | Not specified |  |
|                            | Zinc (Zn)     | 0.082      | mg/L | Not specified |  |
| 04/27/95<br>(NYCDEP 1995)  | Lead (Pb)     | Exceedance | mg/L | Not specified | General remarks indicate exceedances; however, the raw data is illegible due to poor copy quality. |
|                            | Nickel (Ni)   | Exceedance | mg/L | Not specified |  |
| 04/29/96<br>(NYCDEP 1996a) | Nickel (Ni)   | 5.2        | mg/L | 3.0           | ---  |
| 05/06/02<br>(NYCDEP 2002c) | pH            | <4         | SU   | 5 < pH < 11   | ---  |
| 10/24/03<br>(NYCDEP 2003b) | Nickel (Ni)   | 3.17       | mg/L | 3.0           | ---  |
| 02/17/04<br>(NYCDEP 2004b) | pH            | <4         | SU   | 5 < pH < 11   | ---  |
| 03/30/04<br>(NYCDEP 2004b) | Nickel (Ni)   | 3.6        | mg/L | 3.0           | ---  |
|                            | pH            | <5         | SU   | 5 < pH < 11   | ---  |

Notes:

--- – no notes reported

mg/L – milligram per liter

NYCDEP – New York City Department of Environmental Protection

SU – standard unit

x – constituent analyzed for; however, results illegible due to poor copy quality

### 9.3.5 Surface Water Summary

Information about on-site stormwater management and infrastructure was not identified in documents available for review. Wastewater at the site is treated (as described in Section 7.1) prior to discharge from the site into a combined municipal sewer system. When the combined flows exceed the system's capacity, untreated CSOs are discharged through Outfall NC-015 to English Kills, a tributary to Newtown Creek (NYCDEP 2007). NYCDEP issued an IWD permit to the site in 1992. The permit was renewed in 1993, 1998, 2002, and 2003 (NYCDEP 1992b, 1993, 1998, 2002b, 2003a). Additional permits were not identified in documents available for review. Metal concentrations and pH exceeded permitted discharge limits several times between 1995 and 2004 (NYCDEP 1995, 1996a, 2002a, 2003b, 2004b).

### 9.4 Sediment

Creek Sediment Data

☐ Yes ☐ No ☒ Not Applicable

Information regarding sediment investigations was not identified in documents available for review.

### 9.5 Air

Air Permit

☐ Yes ☒ No

Air Data

☐ Yes ☒ No

#### 9.5.1 Air Permit

The AFS database indicates that an air discharge permit (AFS No. 3604703030) has been issued to the site; however, copies of the permit were not located in documents available for review (USEPA 2011).

## 10 REMEDIATION HISTORY (INTERIM REMEDIAL MEASURES AND OTHER CLEANUPS)

Information regarding on-site remedial activities was not identified in documents available for review.



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## 12 ATTACHMENTS

### Figures

Figure 1 Site Vicinity Map: Wilco Finishing Corp.

### Tables

Table 1 Potential Areas of Concern and Transport Pathways Assessment

**Table 1**  
**Potential Areas of Concern and Transport Pathways Assessment – Wilco Finishing Corp.**

| Potential Areas of Concern   | Media Impacted |                 |             |                    |                | COPCs          |                |                 |                                |      |                  |       |      |            |           |        |      |                           |                | Potential Complete Pathway |             |                              |                                     |                        |              |              |
|--|----------------|-----------------|-------------|--------------------|----------------|----------------|----------------|-----------------|--------------------------------|------|------------------|-------|------|------------|-----------|--------|------|---------------------------|----------------|----------------------------|-------------|------------------------------|-------------------------------------|------------------------|--------------|--------------|
| Description of Areas of Concern  | Surface Soil   | Subsurface Soil | Groundwater | Catch Basin Solids | Creek Sediment | TPH            |                |                 | VOCs                           |      |                  | SVOCs | PAHs | Phthalates | Phenolics | Metals | PCBs | Herbicides and Pesticides | Dioxins/Furans | Overland Transport         | Groundwater | Direct Discharge – Overwater | Direct Discharge – Storm/Wastewater | Discharge to Sewer/CSO | Bank Erosion | Air Releases |
|  |                |                 |             |                    |                | Gasoline-Range | Diesel – Range | Heavier – Range | Petroleum Related (e.g., BTEX) | VOCs | Chlorinated VOCs |       |      |            |           |        |      |                           |                |                            |             |                              |                                     |                        |              |              |
| Equipment and products used and activities performed in former electroplating and metal finishing practices and operations (including nickel, chromium and copper plating, nickel and chromium stripping, acid and alkaline cleaning, acid pickling, electro cleaning, and polishing, and site discharges) | ?              | ?               | ?           | ?                  | ?              | ?              | ?              | ?               | ?                              | ?    | ?                | ?     | ?    | ?          | ?         | ?      | ?    | ?                         | ?              | --                         | ?           | --                           | ?                                   | ?                      | --           | ?            |
| Equipment and products used and activities performed in current electroplating practices and operations  | ?              | ?               | ?           | ?                  | ?              | ?              | ?              | ?               | ?                              | ?    | ?                | ?     | ?    | ?          | ?         | ?      | ?    | ?                         | ?              | --                         | ?           | --                           | ?                                   | ?                      | --           | ?            |
| Former UST (closed in 1998)  | ?              | ?               | ?           | ?                  | ?              | ?              | ?              | ?               | ?                              | ?    | ?                | ?     | ?    | ?          | ?         | ?      | ?    | ?                         | ?              | --                         | ?           | --                           | ?                                   | ?                      | --           | ?            |

## Notes:

✓ – COPCs are/were present in areas of concern having a current or historical pathway that is determined to be complete or potentially complete.

? – There is not enough information to determine if COPC is/was present in area of concern or if pathway is complete.

-- – Current or historical pathway has been investigated and shown to be not present or incomplete.

BTEX – benzene, toluene, ethylbenzene, and xylene

COPC – constituent of potential concern

CSO – combined sewer overflow

PAH – polycyclic aromatic hydrocarbon

PCB – polychlorinated biphenyl

SVOC – semi-volatile organic compound

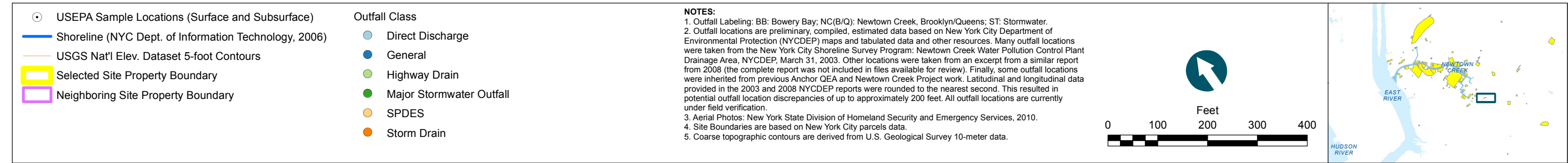
TPH – total petroleum hydrocarbon

UST – underground storage tank

VOC – volatile organic compound



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**Figure 1**  
Site Vicinity Map  
Draft Upland Site Summary: Wilco Finishing Corp.  
Newtown Creek RI/FS